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June 19, 2025

**Via ECF and Email**

United States Magistrate Judge Stacey D. Adams  
Frank R. Lautenberg U.S. Post Office & Courthouse Building  
2 Federal Square  
Newark, NJ 07102

***Re: John Doe v. Baila Sebrow  
United States District Court, District of New Jersey  
Case No.: 2:21-cv-20706***

Dear Judge Adams,

I represent the plaintiff, John Doe (“Plaintiff”), in the above-referenced matter. On June 19, 2025 – a federal holiday – at 2:59 P.M., I received an email from Mr. Novak informing me he *may* appear for Ms. Sebrow and requests our consent to adjourn Monday’s appearance. Less than an hour and a half later, Mr. Novak wrote to the court requesting the adjournment.

Initially, on May 7, 2025, Ms. Sebrow was provided until June 13, 2025 to retain new counsel or else she must proceed pro se (DE 148). She apparently did not retain counsel by the deadline.

By Mr. Novak’s own admission, he met with Ms. Sebrow last week yet waited until today to request an adjournment. Mr. Novak cites the need for more time to review ESI discovery and speak with defendant’s expert, however, as the court is aware, there was no ESI discovery and Ms. Sebrow has no expert.

Ms. Sebrow’s request comes on the heels of the New Jersey State Court issuing a Final Restraining Order against Ms. Sebrow based on her conduct toward Plaintiff and dismissing her Domestic Violence case (Exhibit 1). The request to adjourn the appearance is just another delay in a long line of delays.

Furthermore, I am out of the country from July 8 until July 22 and am the only attorney admitted to practice in New Jersey at the firm. To adjourn the appearance will inevitably put the matter into August or September. This case was commenced in 2021.

My client has already taken off from work for Monday’s conference. In light of the late adjournment request, the potential for further delay, and clear uncertainty as to whether Mr. Novak will represent Ms. Sebrow, it is respectfully requested that the appearance go forward Monday. Thank you in advance.

Respectfully submitted,

VERIDIAN LEGAL P.C.  
/s/ Daniel S. Szalkiewicz  
By: Daniel S. Szalkiewicz, Esq.